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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,  
  
Plaintiffs,  
  
v.  
  
META PLATFORMS, INC.,  
  
Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**REPLY DECLARATION OF BRIAN J.  
DUNNE IN SUPPORT OF ADVERTISER  
PLAINTIFFS' MOTION TO EXCLUDE  
THE EXPERT REPORT AND  
TESTIMONY OF DR. CATHERINE  
TUCKER**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States  
3 District Court for the Northern District of California. I am a partner at Bathae Dunne LLP, counsel for  
4 Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth  
5 here and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Reply in Support of Their  
7 Motion to Exclude the Expert Report and Testimony of Dr. Catherine Tucker.

8 3. Attached as **Reply Exhibit 1** is a true and correct copy of excerpts from the deposition  
9 of Catherine Tucker, Ph.D, conducted September 26, 2023.

10 4. Attached as **Reply Exhibit 2** is a true and correct copy of documents produced by  
11 Defendant Meta Platforms, Inc. as PALM-007837436 and PALM-007837437 in this action.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed on November  
13 3, 2023, in Austin, Texas.

14 /s/ Brian J. Dunne  
15 Brian J. Dunne  
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